



DELAWARE AUDUBON SOCIETY

Chapter of National Audubon
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January 12, 2006

Dr. Jim Hoff
NOAA Damage Assessment Center
1305 East-West Highway
SSMC-4 Room 10219
Silver Spring, MD 20910

RE: *M/T Athos I* Natural Resource Damage Assessment

Dear Dr. Hoff:

Thank you for your recent letter soliciting suggestions from Delaware Audubon for ecological restoration ideas as part of the *M/T Athos I* Natural Resource Damage Assessment (NRDA) process. Many of Audubon's members volunteered for a variety of bird identification and recovery operations that resulted from the November 26, 2004 oil spill. We continue to be concerned about the long-term impacts of this spill on the ecology of the Delaware River. Delaware Audubon respectfully offers the following suggestions for restoration.

As a general matter, we support the restoration efforts and priorities of the Northern Delaware Wetlands Rehabilitation Program (NDWRP), which is administered by Delaware's Department of Natural Resources and Environmental Control (DNREC), Division of Fish & Wildlife. This program was established to bring together civic and business leaders, scientists, resource managers, and property owners to develop strategies to restore nearly 10,000 acres of wetlands in 31 distinct sites along the Christina and Delaware rivers in New Castle County. Information on this program can be found on DNREC website at: <http://www.dnrec.state.de.us/fw/intmrmt.htm>

More specifically, Delaware Audubon supports ecological restoration of the Denton property. We are currently in conceptual discussions with BP Amoco about possible opportunities for ecological restoration of a 31-acre parcel, which includes valuable tidal resources along the Delaware River. This site is referred to as the Denton property. A portion of the site was used from 1968 to 1980 as a landfill for the disposal of non-hazardous atactic, a by-product of polypropylene production from the former Amoco plant. In 1990, DNREC granted approval for Dureco Polymers to excavate and remove recyclable

polypropylene from the landfill. As of January 1999, approximately 95 percent of the landfill had been excavated and a substantial portion of the site was backfilled and graded with clean fill. In November 1999, Amoco entered into a Consent Order with DNREC to conduct an investigation and cleanup of the site. On April 2, 2003 DNREC approved the final plan of remediation for the site. The plan was implemented and a Certificate of Completion of Remedy was issued by DNREC on September 3, 2004.

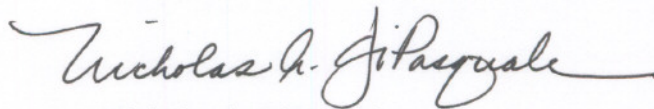
The site offers great potential for development into an environmental education/nature center. The former Denton family home could easily be converted into a nature center and Delaware Audubon office. The nature center would serve the growing residential developments that have sprung up in the area. The site also is adjacent to the state's largest population centers in Wilmington and old New Castle. Other ecological improvements, including the removal of a barge, which restricts tidal flow to the site, invasive species control (especially phragmites), and reforestation of upland habitats also could be performed. Delaware Audubon and the Wildlife Habitat Council also have initiated preliminary discussions about the possibility of using this site to demonstrate opportunities for the ecological restoration of a former "brownfield" site. (See Restoration Idea Form)

Finally, Delaware Audubon also would like to suggest Grass Dale Wetlands for ecological restoration. This site is located along the C&D Canal in Fort DuPont State Park. Grass Dale is a unique area where at least six different habitats are found within a 100-yard radius. Woods, tidal marsh, fresh water pond, hedgerows, meadow and scrub habitat can be observed. Delaware Audubon has cataloged 140 species of birds, 85 plants, 51 insect, 19 mammal, 11 amphibian, 1 minnow, 1 crustacean 1 invertebrate, and 1 fungus. The site is in need of phragmites control, maintenance of the walking path and control of *Elaeagnus umbulata* or Autumn Alive in the Sector 4 Meadow to encourage the growth of Bayberry bushes.

Delaware Audubon appreciates the opportunity to offer these ecological restoration ideas. We believe they meet many of the Restoration Selection Factors established by NOAA to meet the legal requirements of the federal Oil Pollution Act. We look forward to working with the Office of Response and Restoration and the state and federal natural resource trustees to develop these ideas further.

Please feel free to contact me at 302.423.4140 (c) or by e-mail at nicholasdi@aol.com if you have any questions or need additional information.

Most sincerely,



Nicholas A. DiPasquale
Conservation Chair

pc: Delaware Audubon Board
Chris Olson, Manager, Real Estate Reuse, BP Amoco
Rob Hossler, Regional Manager, DNREC Division of Fish & Wildlife

M/T ATHOS / NATURAL RESOURCE DAMAGE ASSESSMENT

RESTORATION IDEA FORM * DENTON PROPERTY, NEW CASTLE CO., DE

Instructions

Please complete as many sections as possible. Your ideas will still be considered even if you are unable to fill out every section. If you need more space, please use additional paper and label appropriate sections. Completed forms should be sent to the contact listed below.

Your Name: *NICHOLAS A. DI PASQUALE*
CONSERVATION CHAIR
DELAWARE AUDUBON

Street Address:
90 45 SHADY LANE

City, State, Zip
DOVER, DE 19901

Phone and E-Mail
302.697.3320 (H) 302.423.4140 (C)
nicholasdi@aol.com

Restoration Idea: Please describe the restoration idea and its location. If you have a specific project in mind, please tell us how it will result in restoration of injured natural resources to baseline conditions and/or compensation for interim losses. Please complete a separate form for each restoration idea submitted

*ACQUISITION OF 31± ACRES OF TIDAL WETLANDS, MARSH AND UPLAND
 SCRUB / SHRUB HABITAT.*

- RESTORE SITE HYDROLOGY / TIDAL FLOW, REMOVE SUNKEN BARGE
 WHICH RESTRICTS TIDAL MOVEMENT*
- TREAT / REDUCE INVASIVE SPECIES, INCLUDING PHRAGMITES*
- REFOREST UPLAND AREAS*
- ESTABLISH ENVIRONMENTAL EDUCATION / NATURE CENTER
 AND DELAWARE AUDUBON OFFICE IN FORMER
 DENTON FAMILY HOME*
- CONDUCT TOURS AND HANDS ON DEMONSTRATION PROJECTS FOR
 STUDENTS & THE PUBLIC*
- DEMONSTRATE THE OPPORTUNITIES FOR ECOLOGICAL RESTORATION
 OF FORMER BROWN FIELD SITE*

Contacts: Please provide names, addresses, and phone numbers of people knowledgeable about the restoration idea or projects. *NICHOLAS A. DI PASQUALE - SEE ABOVE*

CHRIS OLSON, BP AMOCO
MANAGER, REAL ESTATE REUSE
630.836.7128 olsoncj@bp.com

THANK YOU VERY MUCH FOR YOUR TIME!

Completed Forms and/ or questions can be directed

Dr. Jim Hoff, NOAA Damage Assessment Center
 1305 East-West Highway, SSMC-4, Room 10219
 Silver Spring, MD 20910
 (301 713-3038 ext. 188

* Please note that this is not a solicitation or request for proposals. The information provided on this form will be used by the trustees to develop specific restoration alternatives.

Denton Property

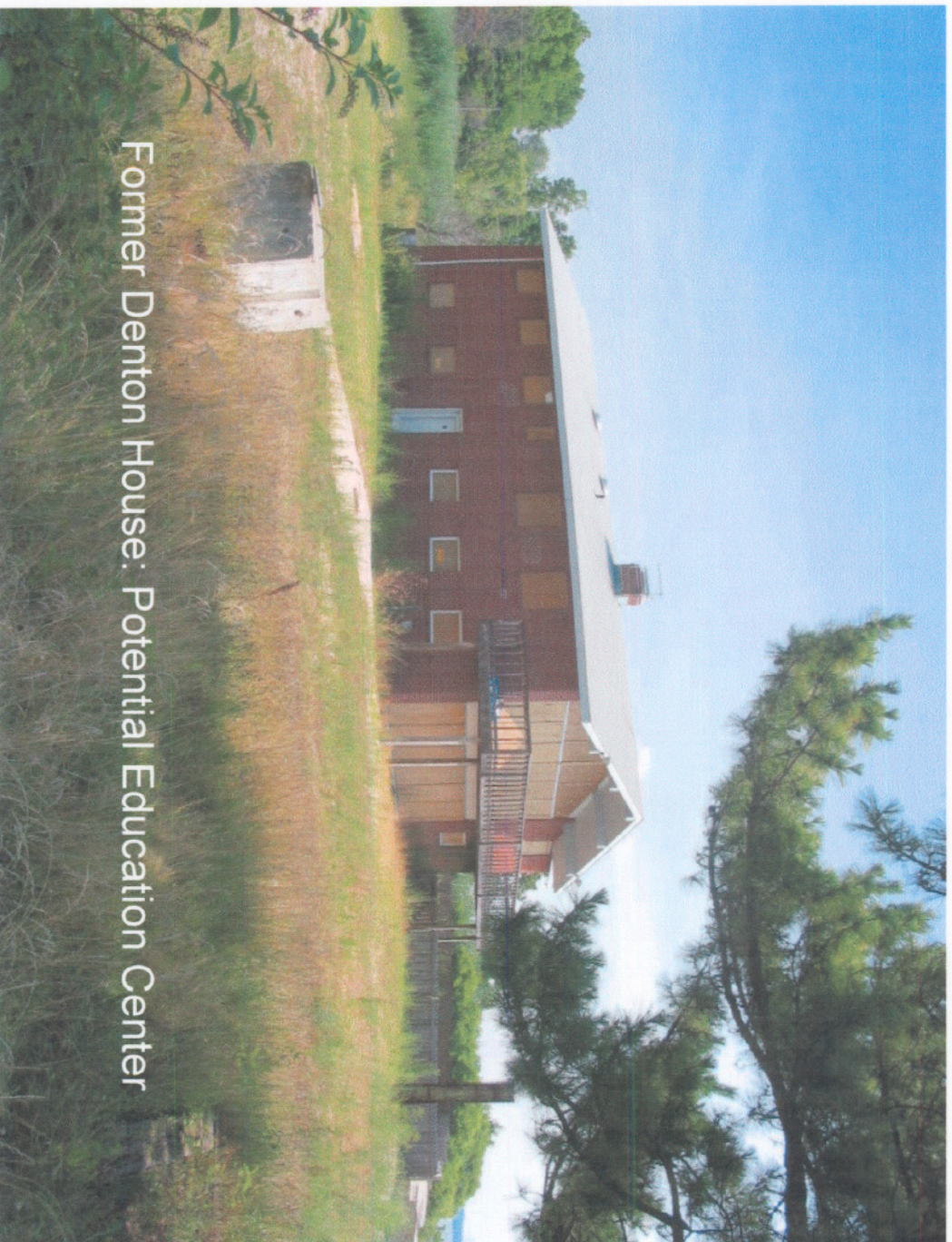


2002 Aerial Photo of 31 Acre Denton Site



Potential Opportunities for *Three Forts Nature Preserve*

Property Attributes



Former Denton House: Potential Education Center